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Attorneys for Defendant  
SMITH'S FOOD & DRUG CENTERS, INC.

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

VERDETTE PAGE, an individual,  
Plaintiff,

vs.

THE KROGER CO., a foreign corporation;  
SMITH'S FOOD & DRUG CENTERS, INC.,  
a foreign corporation; DOE & ROE  
MAINTENANCE EMPLOYEES; DOE &  
ROE MAINTENANCE COMPANIES; DOE  
& ROE EMPLOYEES; DOE & ROE  
EMPLOYERS; DOE OWNERS I-V; ROE  
OWNERS I-V; ROE EMPLOYERS I-V;  
DOES I-V; and ROE COMPANIES I-V,  
inclusive

Defendants.

Case No. 2:24-cv-01658-CDS-NJK

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE JOINT PRE-  
TRIAL ORDER**

**[SECOND REQUEST]**

**WHEREAS** Plaintiff VERDETTE PAGE (hereinafter "Plaintiff") and Defendant SMITH'S FOOD & DRUG CENTERS, INC. (hereinafter "SMITH'S"), by and through their respective counsel of record as undersigned, are presently working together to draft the Joint Pre-Trial Order;

**WHEREAS** the present deadline for the Parties to file the Joint Pre-Trial Order is set for May 16, 2025;

**WHEREAS** the Parties have met and conferred in good faith regarding additional damages disclosed by Plaintiff and are presently determining the need for motion practice regarding same. Specifically, on May 6, 2025, the undersigned counsel for SMITH'S addressed the issues in this motion by telephone with the undersigned counsel for Plaintiff. Through counsel, the Parties agreed that this

1 motion does not involve a “discovery dispute,” and, therefore, does not require the “meet and confer”  
 2 certification required by Local Rule 26-6(c). Counsel further agreed that, because this Motion does not  
 3 involve a “discovery dispute,” it should be heard in the first instance by the US District Court Judge,  
 4 consistent with Local Rule 26-6(a); and

5 **WHEREAS** the Parties have agreed to a brief extension to file the Joint Pre-Trial Order:

6 **IT IS HEREBY STIPULATED AND AGREED** by and between Plaintiff and SMITH’S, by  
 7 and through their respective counsel of record, that the deadline for filing the Joint Pre-Trial Order  
 8 pursuant to Local Rules 16-3(b) and 26-3 shall be extended by thirty-one (31) days, or until June 16,  
 9 2025, to allow the Parties to thoughtfully discuss the contents thereof and submit same to this Court.

10 **IT IS SO STIPULATED.**

11 Respectfully submitted to this Court on May 16, 2025.

12 **ERIC BLANK INJURY ATTORNEYS**

**COOPER LEVENSON, P.A.**

13 */s/ Eric R. Blank*

*/s/ Pooja Kumar*

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 Smith’s Food & Drug Centers, Inc.

22 **ORDER**

23 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that the Parties shall have until  
 24 June 16, 2025, to file the Joint Pre-Trial Order. **NO FURTHER EXTENSIONS OF THIS**  
**DEADLINE WILL BE GRANTED.**

25 **IT IS SO ORDERED.**

26   
 27 UNITED STATES MAGISTRATE JUDGE

28 **DATE:** May 19, 2025